ifca
ILLINOIS FERTILIZER & CHEMICAL ASSOCIATION

P.O. Box 186
St. Anne, Illinois 60964-0186
Telephone: (815) 427-6644
Fax No.: (815) 427-6573

September 7, 2000

Mississippi River/Gulf of Mexico Action Plan (4503F)
c/o U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

RE: Comments on the Draft Action Plan of Action for Reducing, Mitigating, and Controlling Hypoxia in the Northern Gulf of Mexico

On behalf of the Illinois Fertilizer & Chemical Association (IFCA) please accept the following comments regarding the proposed hypoxia action plan.

IFCA's membership consists of owners, managers and employees of retail agrichemical facilities located in Illinois, as well as representatives of pesticide, fertilizer and agricultural equipment manufacturers. The majority of IFCA's 1000+ members are directly responsible for serving the needs of Illinois' agricultural producers. IFCA is committed to developing and helping implement programs that upgrade and enhance the safe handling and efficient use of agricultural chemicals and commercial fertilizers.

It is with great seriousness and concern for the well-being of the agricultural industry that we remit these comments on the hypoxia strategy. From the beginning, the hypoxia issue has been driven mainly by policy and a single theory that primarily blames nitrogen inputs by the ag industry as the cause of the hypoxic zone in the Gulf. Other theories and hypothesis seem to have been discounted and the scientific process circumvented in order to attain the goal of restricting agricultural activities in the Midwest.

One need only look at the recently released report on the size of the hypoxic zone this year to conclude that the CENR's conclusions regarding nitrogen fertilizer use are seriously flawed—the zone is $1/5^{th}$ the size of the 1999 zone despite the fact that nitrogen fertilizer use in the Midwest has remained fairly constant. It is understandably difficult for the agricultural industry to buy into a proposed reduction in nitrogen inputs when the most recent data cannot directly correlate nitrogen use to the size of the zone.

The IFCA has and continues to support agronomically sound practices that promote the efficient and effective utilization of all plant nutrient inputs. We continue to support practical, integrated approaches to reduce nutrient over-enrichment in the Gulf and in all water bodies (Goal 1C). However, it must be understood that the fertilizer industry and producers are not completely in control of the factors that can affect nitrogen utilization by crops. Weather conditions appear to have a tremendous affect on the hypoxic zone, as evidenced by the 1993 flood and the recent

dryness in the Midwest. The fertilizer industry consistently strives to increase the efficiency of plant nutrient inputs taking into consideration science-based agronomic recommendations and past growing conditions, but it is imperative the policy makers understand that an across-the-board reduction in nitrogen does not directly correlate to a reduction in the hypoxic zone.

We strongly oppose setting the numeric goal of a 20-40% reduction in the annual average nitrogen loading to the Mississippi/Atchafalaya Rivers. IFCA is not opposed to reducing nitrogen losses. In fact we actively promote and nutrient management planning activities and application practices that help producers identify the appropriate nitrogen rate for their crop taking into account nitrogen credits from legumes and other sources, and basing the rate of application on a five-year average yield.

Establishing a 20-40% numeric standard for reducing nitrogen losses mischaracterizes the complexity of the issue. Setting such a standard has the potential to set the stage for input restrictions, which do NOT directly correlate to a reduction in nitrogen loss. A well-managed farm may put down the same amount of nitrogen as a farm on the other side of the river, yet the method of application, the management of the crop's overall health and weather all play a key role in determining the utilization of the nitrogen. Therefore, a numeric standard is useless in achieving the goal of reducing over-enrichment. We need to look at more holistic approaches including additional research on nitrogen utilization and methods and timing of application to ensure that science rules crop management rather than public policy.

IFCA supports the comments of the Illinois Department of Agriculture including the concerns over the absence of a cost-benefit analysis. Because nitrogen is an essential nutrient for corn, any across the board reductions will have an impact on yield and therefore on the profitability of Illinois corn growers and consequently the overall economic health of the state. The Topic 6 report states that "the direct measurable dollar benefits to Gulf fisheries of reducing nitrogen loads from the Mississippi River Basin are very limited at best." One thing we do know: crippling corn production in the Midwest by substantially reducing nitrogen inputs will very definitely have a direct measurable dollar impact on Illinois farmers, agribusiness and the state.

We support the long-term goal of reducing nitrogen losses through voluntary, cost-effective efforts by the states and tribes. The fertilizer input industry in Illinois is in the best position to help take a leadership role on proper management of nitrogen inputs, and we ask USEPA to recognize our expertise and our unique relationship with producers and our land-grant universities. We have and will continue to make progress on improving the efficiency of nitrogen utilization in ways that allow for profitability for producers and overall improved water quality in our state and the nation.

Kind regards,

The Illinois Fertilizer and Chemical Association

Jean Trobec

Jean Trobec
Government Relations Director